

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION

IN RE:	CASE NO:
KEVIN JOSEPH STRICKLAND	10-00560-8-JRL
DEBTOR	CHAPTER 7

**TRUSTEE'S EX PARTE MOTION FOR EXAMINATION OF DOCUMENTS PURSUANT
TO BANKRUPTCY RULE 2004**

NOW COMES James B. Angell, Chapter 7 Trustee in the above-referenced case, by and through undersigned counsel, and moves this Court for an order requiring Kevin Joseph Strickland to permit examination of certain documents pursuant to Rule 2004, and says the following:

1. The Debtor filed a voluntary petition for relief on January 26, 2010, under Chapter 7 of title 11, United States Code. James B. Angell is the duly appointed, qualified and acting Chapter 7 Trustee ("Trustee").
2. The Trustee seeks information in the possession of Kevin Joseph Strickland regarding the acts, conduct, or property or the liabilities and financial condition of the debtor, or any matter which may affect the administration of the debtor's estate or the debtor's right to a discharge.

WHEREFORE, the Trustee moves this Court for an order pursuant to Fed. R. Bankr. P. 2004:

1. Requiring Kevin Joseph Strickland to produce those documents described on Exhibit A attached hereto for examination and copying at the offices of Howard, Stallings, From & Hutson, P.A., at 5410 Trinity Road, Suite 210, Raleigh, North Carolina, 27607 on or by Monday, May 17 at 5:00 P.M. or such later date as may be designated by the Trustee; and further
2. Providing such other relief as may be just and proper.

DATED:

APR 30 2010

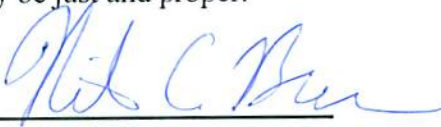

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EXHIBIT A

For the purpose of this request, "Complete Records" shall mean any legal pleadings, deeds, bills of sale, deeds of trust, mortgages, security agreements, promissory notes, contracts, agreements, insurance policies, correspondence, emails, notes, memoranda, invoices, bills, checks, check registers, pay advices, credit card statements, accounting journals, general ledgers, income statements, balance sheets, financial statements, tax records, corporate minutes, articles of organization, bylaws, and any other document whatsoever relating to the matter as to which the request is made.

1. Complete copies of all tax returns filed in your name, for tax years 2005 through 2009. Please include in your answers all schedules, worksheets, and attachments related to each tax return, including but not limited to W-2 and 1099 forms.
2. All tax returns filed in the name of any business in which you had an interest for tax years 2005 through 2009. Please include in your answer all schedules, worksheets, and attachments related to each tax return.
3. Complete records for any and all sources of revenue or income you received between January 1, 2005, and the date of filing, including but not limited to documentation of the amounts, the payors, the reason for the revenue or income, and employment agreements or other contracts pursuant to which you received any income.
4. Complete records regarding any and all bank or brokerage accounts in your name either individually or with others, and any and all accounts on which you held custodial rights or signatory authority. These records shall include, but are not limited to:
 - o Complete bank statements for any accounts from January 1, 2005, through the date of filing.
 - o Front and back copies of cancelled checks from January 1, 2005, through the date of filing.
 - o Documentation of any outgoing wire transfers, including but not limited to payee and account information from January 1, 2005, through the date of filing.
 - o Documentation to show source of funds deposited from January 1, 2005, through the date of filing, including but not limited to photocopies of checks deposited and information concerning any wire transfers.
5. Complete records regarding any and all bank or brokerage accounts related to any business in which you were an officer, member and/or principal. These records shall include, but are not limited to:
 - o Complete bank statements for any accounts from January 1, 2005, through the date of filing.
 - o Front and back copies of cancelled checks from January 1, 2005, through the date of filing.

- Documentation of any outgoing wire transfers, including but not limited to payee and account information from January 1, 2005, through the date of filing.
 - Documentation to show source of funds deposited from January 1, 2005, through the date of filing, including but not limited to photocopies of checks deposited and information concerning any wire transfers.
- 6. Complete copies of any financial statements prepared by you from January 1, 2005, through the date of filing.
- 7. Complete copies of any and all materials including, but not necessarily limited to, complete copies of all pleadings, discovery, transcripts, and correspondence, relating to any and all lawsuits filed within five (5) years preceding the date of your bankruptcy petition either by or against you individually or any business in which you had an interest or held title.
- 8. Complete records of your finances of any type from January 1, 2005, through the date of filing not identified elsewhere in this Exhibit A.
- 9. Complete records of any assignments or transfers of any property, real or personal, tangible or intangible, by you to anyone since January 1, 2005.
- 10. Complete records of any and all transfers by you of interest in property worth greater than \$3,000.00 and made within five (5) years prior to filing your bankruptcy petition. Please include in your answer the names of all transferees and a description of any consideration received for each transfer.
- 11. All organizational documents of any company in which you were a member, officer, and/or principal within the five (5) year period prior to filing your bankruptcy petition, including but not limited to copies of the articles of incorporation, operating agreements, and minutes.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that she is over eighteen (18) years of age and the **TRUSTEE'S EX PARTE MOTION FOR EXAMINATION OF DOCUMENTS PURSUANT TO BANKRUPTCY RULE 2004** was this day served upon the below named persons, parties and/or counsel by mailing, postage prepaid, first class mail, a copy of such instruments to such persons, parties and/or counsel at the address shown below or as indicated below:

Marjorie K. Lynch, Esquire
Bankruptcy Administrator
Post Office Box 3758
Wilson, North Carolina 27894-3758

Kevin Joseph Strickland
Po Box 220
Burgaw, NC 28425

Dated: APR 30 2010



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